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Tonopah Solar Energy, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRAHMA GROUP, INC., a Nevada corporation,

Plaintiff,

vs.

TONOPAH SOLAR ENERGY, LLC, a Delaware
limited liability company; DOES I through X; and
ROE CORPORATIONS I through X,

Defendant.

TONOPAH SOLAR ENERGY, LLC, a Delaware
limited liability company; DOES I through X; and
ROE CORPORATIONS I through X,

Counterclaimant,

vs.

BRAHMA GROUP, INC., a Nevada corporation,

Counterdefendant.

Case No. 2:18-cv-01747-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
BRAHMA GROUP, INC.'S MOTION TO
LIFT STAY, SUBSTITUTE THE
REORGANIZED TSE LLC, JOIN COBRA
AND AHAC, AND REMAND TO STATE
COURT (SECOND REQUEST) AND TO
EXTEND DEADLINE TO FILE A REPLY
BRIEF (FIRST REQUEST)**

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Defendant/Counterclaimant Tonopah Solar Energy, LLC (“TSE”) and Plaintiff/Counterdefendant Brahma Group, Inc. (“Brahma”), by and through their respective undersigned counsel, hereby stipulate and agree to the following briefing schedule on Brahma’s Motion to Lift Stay, Substitute the Reorganized TSE LLC, Join Cobra and AHAC, and Remand to State Court (“Motion”) (ECF No. 87):

- Extend the deadline for TSE or any interested non-parties, including, but not necessarily limited to rTSE, Cobra Thermosolar Plants, Inc., and American Home Assurance Company, to the extent necessary, to respond to the Motion from October 11, 2021 to October 25, 2021. Brahma filed the Motion on September 10, 2021. This is the second stipulation for an extension of time to respond to the Motion. *See* ECF No. 90 (order granting the first stipulation).
- Extend the deadline for Brahma to file a reply in support of the Motion from 7 days after service of the response to 21 days from October 25, 2021, thereby making the reply due by November 15, 2021. This is the first stipulation for such an extension of time.

The parties submit that good cause exists for this briefing schedule given the number and complexity of the issues raised in the Motion and the burden imposed on counsel on both sides with pre-existing commitments and trial. The parties further submit that the extension is in good faith and not for the purposes of delay.

DATED: October 7, 2021

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/s/ Ryan T. Gormley
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: October 7, 2021